

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In Re:

JOHNNY DARRELL LORICK

Debtor(s)

CASE NO. 19-00252-JJG-13

Chapter 13

Judge Jeffrey J. Graham

**OBJECTION TO CHAPTER 13 PLAN**

Creditor, Colonial National Mortgage, a Division of Colonial Savings, FA (“Creditor”), by and through counsel, hereby objects to the proposed Chapter 13 Plan filed by the Debtor. This Objection is hereby supported by the following Memorandum.

Respectfully Submitted

/s/ Martha R. Spaner

---

Martha R. Spaner  
Attorney for Creditor  
Reisenfeld & Associates LLC  
3962 Red Bank Road  
Cincinnati, OH 45227  
voice: (513) 322-7000  
facsimile: (513) 322-7099  
e-mail: inbk@rslegal.com

**MEMORANDUM**

Creditor holds a Mortgage on the real estate located at 6445 Harrison Ridge Blvd, Indianapolis, IN 46236. Creditor filed a Proof of Claim on May 13, 2019, claim #5-2 listing an arrearage of \$81,008.96 and a balance of \$250,427.58. The subject property is Debtors primary residence and Debtor cannot change the amount owed, interest rate, or other terms of a first mortgage. (11 U.S.C. 1322(b)(2)). Creditor is not opposed to the Debtor selling the property, as long as the sale pays off the Creditor's lien in full, however the plan as currently proposed does not protect the interest of the Creditor while the Debtor tries to market the property.

The Chapter 13 Plan as proposed herein does not adequately protect the Creditors' interest in said real estate.

WHEREFORE, Creditor requests that confirmation be denied.

/s/ Martha R. Spaner

---

Martha R. Spaner  
Attorney for Creditor  
Reisenfeld & Associates LLC  
3962 Red Bank Road  
Cincinnati, OH 45227  
voice: (513) 322-7000  
facsimile: (513) 322-7099  
e-mail: inbk@rslegal.com

### **CERTIFICATE OF SERVICE**

I certify that on December 16, 2019, a true and correct copy of the Objection to Plan was served:

**Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:**

Michael J. Norris, Debtor`s Counsel  
mike@mikenorrislaw.com

Ann M. DeLaney, Bankruptcy Trustee  
ECFdelaney@trustee13.com

U.S. Trustee  
(Registered Address)@usdoj.gov

**And by regular U.S. Mail, postage prepaid on:**

Johnny Darrell Lorick, Debtor  
6445 Harrison Ridge Blvd.  
Indianapolis, IN 46236

/s/ Martha R. Spaner

---

Martha R. Spaner  
Attorney for Creditor  
Reisenfeld & Associates LLC  
3962 Red Bank Road  
Cincinnati, OH 45227  
voice: (513) 322-7000  
facsimile: (513) 322-7099  
e-mail: inbk@rslegal.com